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February 22, 2019

Ms. Marlene H. Dortch
Federal Communications Commission (FCC)
Office of the Secretary
445 12th Street, SW, Suite TW-A325
Washington, DC 20554

Re: EB Docket No. 06-36

Dear Ms. Dortch:

Enclosed for electronic filing in compliance with the FCC Customer Proprietary Network Information (CPNI) rules under 47 C.F.R. § 64.2009(e) is the CPNI Annual Compliance Certification and accompanying Statement of Operating Procedures for BEK Communications Cooperative (499 Filer ID: 802023) covering the year 2018.

Please contact me if you have any questions or concerns regarding this filing.

Respectfully Submitted,

Derrick Bulawa
CEO/General Manager
BEK Communications Cooperative
derrick@bektel.coop
(701) 475-2361

Attachments: Annual CPNI Certification and Statement of Operating Procedures

BEK Communications

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Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2019 covering the prior calendar year 2018

1. Date filed: February 22, 2019
2. Name of company covered by this certification: BEK Communications Cooperative
3. Form 499 Filer ID: 802023
4. Name of signatory: Derrick Bulawa
5. Title of signatory: CEO/General Manager
6. Certification:

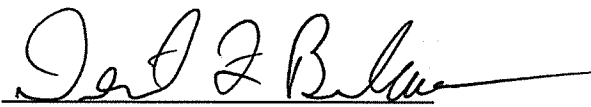
I, Derrick Bulawa, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has received one customer complaint in the past year concerning the unauthorized release of CPNI. A summary of this complaint is attached.

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed: 

Attachment: Accompanying Statement of CPNI Procedures

Per the FCC CPNI rules [47 CFR §64.2009(e)] and as referenced in the attached signed certification, BEK Communications Cooperative, herein referenced as the Company hereby certifies that the Company [and its affiliates] is in compliance with the FCC CPNI rules and has outlined some of the important operating procedures below in order to ensure the Company's compliance in the protection of CPNI:

1. CPNI manual has to account for all FCC CPNI rules and has been adopted by our Company's board.
2. CPNI Compliance officer has been designated to oversee all CPNI duties, training, and activity
3. CPNI was not utilized for marketing purposes, however if Company should decide to utilize CPNI marketing in the future, the following is in place and will be utilized
 - o Established an outbound marketing supervisory review process for the use of CPNI
 - o Records are maintained for any marketing campaigns that utilize customers' CPNI for a minimum of one year
4. Opt-out method for approval of CPNI use for marketing campaigns is utilized
 - o Customers are notified annually of their rights for the use of their CPNI in marketing campaigns via a bill insert and company newsletter
 - o New customers are notified of the opt-out procedure as a part of the customer sign-up process
 - o Billing system displays customer's opting status
 - o Compliance officer retains CPNI notifications and opting records for at least two years
5. Employees have been trained on when they are, and are not, authorized to use or disclose CPNI
 - o Disciplinary process has been defined and is in place for violations and/or breaches of CPNI
6. Carrier authentication requirements have been met
 - o All customers during a customer-initiated telephone call are authenticated as being an authorized account contact before discussing CPNI (non-call detail or call detail) without utilizing readily available biographical or account information as defined by the FCC
 - o Call detail and non-call detail CPNI is only released to customers during customer-initiated telephone contact if a password is provided. If the requesting customer does not provide a password, only the following FCC approved methods are permitted for the release of the requested CPNI:
 - Sending the requested detail to the address of record (only a physical or email address associated with that particular account that has been in our company files for at least 30 days)
 - Calling the customer back at the telephone of record (only disclosing if the customer was authenticated as being an authorized account contact)
 - Having customer come in to Company's office and provide a valid government issued photo ID
7. Notices are sent immediately to customers indicating particular account changes such as:
 - o password
 - o customer response to a back-up means of authentication for lost or forgotten passwords
 - o online account
 - o address of record
8. Notice of unauthorized disclosure of CPNI, a notification process is in place in order to notify both law enforcement and customer(s) in the event of a CPNI breach within the timeline specified by the FCC
9. Additional protection measures are taken above and beyond the current FCC CPNI rules
 - o Company takes reasonable measures to discover and protect against activity that is indicative of pretexting
 - o Company maintains security of all CPNI, including but not limited to:
 - Documents containing CPNI are shredded

Summary of CPNI Compliant

On November 23, 2018, an individual called BEK's customer service department and identified himself as a customer. BEK fully complied with FCC CPNI rules and the company's CPNI procedures and asked for the customer to provide his CPNI password. When the individual could not provide his password, BEK's customer service representative followed the FCC's CPNI rules and BEK's CPNI policies and procedures by asking "back-up" security questions that are not based on account or biographical information. The individual answered the security question correctly. Because the individual had met the authentication requirements, the BEK customer representative then allowed the individual to change the password and, later that day, changed the customer's telephone number pursuant to the individual's request.

The next day, the customer, along with his banker, contacted BEK and informed the company that his telephone and bank accounts had been compromised. The customer then provided new EFT information and requested a new telephone number. Per customer request and following BEK policy, BEK made necessary changes to customer account including telephone number, CPNI Password, CPNI Security questions and bank account information. BEK CPNI Officers investigated the incident by reviewing call recordings and researching "called-from" number. BEK found that the originating call on November 23 was an area code from Jamaica. CPNI Officer has reviewed the CPNI guidelines with BEK's customer service department and made them aware of possible scam calls from other countries, and the company has made changes to security questions and is considering whether any additional steps beyond that which is required by FCC rules should be taken to further tighten authentication procedures to ensure that such incidences do not occur.